

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SUPER INTERCONNECT  
TECHNOLOGIES LLC,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-259-ADA

JURY TRIAL DEMANDED

**ADDITIONAL ATTACHMENTS TO [DKT. 14-2] DECLARATION OF MARK LIANG  
IN SUPPORT OF GOOGLE LLC'S MOTION TO TRANSFER VENUE TO THE  
NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

- |           |   |
|-----------|---|
| Exhibit 1 | Copy of the Complaint filed by Super Interconnect Technologies LLC ("SIT") filed at Dkt. 1 in <i>Super Interconnect Technologies LLC v. Google LLC</i> , No. 2:18-cv-00463 (E.D. Tex.) ("EDTX Action").                       |
| Exhibit 2 | Google's redacted motion to dismiss for improper venue, filed at Dkt. 21 in the EDTX Action.  |
| Exhibit 3 | Copy of the court's order filed at Dkt. 29 in the EDTX Action.  |
| Exhibit 4 | Copy of the court's order filed on February 18, 2020, at Dkt. 102 in the lead case <i>Super Interconnect Technologies LLC v. Huawei Device Co., Ltd.</i> , No. 2:18-cv-00462 (E.D. Tex.), granting a stay of the EDTX Action. |
| Exhibit 5 | Copy of the court's <i>Markman</i> order in the EDTX Action, filed at Dkt. 93 in the lead case <i>Super Interconnect Technologies LLC v. Huawei Device Co., Ltd.</i> , No. 2:18-cv-00462 (E.D. Tex.).                         |
| Exhibit 6 | Copy of the court's order filed on March 12, 2021, at Dkt. 111 in the lead case <i>Super Interconnect Technologies LLC v. Huawei Device Co., Ltd.</i> , No. 2:18-cv-00462 (E.D. Tex.), dismissing the EDTX Action.            |
| Exhibit 7 | Copy of a redline comparing SIT's Complaint in the present action (Dkt. 1) with its first amended complaint in the EDTX Action.   |

- Exhibit 8 Copy of a subpoena for deposition testimony and document production served by SIT on Qualcomm Inc. in the EDTX Action.
- Exhibit 15 Copy of Harleen Juneja's LinkedIn profile, which indicates that she has left Google in January 2021 and is currently employed at Facebook in Menlo Park, in the San Francisco Bay Area.
- Exhibit 16 Copy of SIT's 2020 Texas Franchise Tax Public Information Report, filed on November 11, 2020, identifying SIT's mailing address as 6136 Frisco Square Blvd., Suite 400, Frisco, Texas.
- Exhibit 20 Copy of annotated excerpts from the 2020 Form 10-K filed by Acacia Research Corporation with the Securities and Exchange Commission, indicating that Acacia Research Corporation's principal offices are at 4 Park Plaza Suite 550, Irvine, California.
- Exhibit 21 Copy of an Acacia Research Corporation webpage, last accessed April 5, 2021, identifying its subsidiary Acacia Research Group as "an industry leader in patent licensing"
- Exhibit 23 Copy of Marc Booth's LinkedIn profile, which indicates that Mr. Booth is located in Newport Beach, California.
- Exhibit 24 Copy of Eric Lucas's LinkedIn profile, which indicates that Mr. Lucas is located in Laguna Beach, California.
- Exhibit 25 Copy of a Qualcomm Inc. ("Qualcomm") webpage, last accessed April 5, 2021, which indicates that Qualcomm has its headquarters at 5775 Morehouse Drive, San Diego, California.
- Exhibit 26 Copy of annotated excerpts from the 2020 Form 10-K filed by Qualcomm with the Securities and Exchange Commission, indicating that Qualcomm's principal executive offices are at 5775 Morehouse Dr., San Diego, California.
- Exhibit 28 Copy of Gyudong Kim's LinkedIn profile, which indicates that Gyudong Kim is an engineer at Analog Devices in the San Francisco Bay Area.
- Exhibit 30 Copy of Min-Kyu Kim's LinkedIn profile, which indicates that Min-Kyu Kim is an analog design engineering manager at Analog Devices, located in San Jose.

- Exhibit 31 Copy of the cover of the transcript of the deposition of Min-Kyu Kim in the EDTX Action.
- Exhibit 32 Copy of the declaration of Jaime Garcia, Contract Manager at Lattice Semiconductor Corporation (“Lattice”), dated October 31, 2019.
- Exhibit 33 Copy of a Lattice webpage, last accessed April 7, 2021, which shows that Lattice has its headquarters at 5555 NE Moore Ct, Hillsboro, Oregon, and maintains a Silicon Valley Development Center at 2115 O’Nel Drive, San Jose, California.
- Exhibit 34 Copy of excerpts of a subpoena served by Google on Lattice in the EDTX Action.
- Exhibit 35 Search for flights from San Francisco International Airport (SFO) to Waco Regional Airport (ACT).
- Exhibit 36 Search for flights from John Wayne Airport (SNA) and Los Angeles International Airport (LAX) to Waco Regional Airport (ACT).
- Exhibit 37 Search for flights from John Wayne Airport (SNA) to San Francisco International Airport (SFO).
- Exhibit 38 Search for flights from San Diego International Airport (SAN) to San Francisco International Airport (SFO).
- Exhibit 39 Search for flights from San Diego International Airport (SAN) to Waco Regional Airport (ACT).
- Exhibit 40 Copy of a report from Docket Navigator showing the number of patent cases in the Northern District of California and the Western District of Texas in the 2019-20 time period.
- Exhibit 41 Copy of a report from Docket Navigator showing a comparison of the median time to trial between the Western District of Texas and the Northern District of California in the 2010-20 timeframe.

Proposed Order

Dated: April 27, 2021

Respectfully submitted,

By /s/ J. Mark Mann

J. Mark Mann

State Bar No. 12926150

mark@themannfirm.com

G. Blake Thompson

State Bar No. 24042033

blake@themannfirm.com

MANN | TINDEL | THOMPSON

201 E. Howard Street

Henderson, Texas 75652

(903) 657-8540

(903) 657-6003 (fax)

Darin W. Snyder (*Pro Hac Vice* pending)

dsnyder@omm.com

David S. Almeling (*Pro Hac Vice* pending)

dalmeling@omm.com

Mark Liang (*Pro Hac Vice* pending)

mliang@omm.com

Sorin G. Zaharia (*Pro Hac Vice* pending)

szaharia@omm.com

Daniel Silverman (*Pro Hac Vice* pending)

dsilverman@omm.com

**O'MELVENY & MYERS LLP**

Two Embarcadero Center, 28th Floor

San Francisco, California 94111-3823

Tel: (415) 984-8700

Fax: (415) 984-8701

*Attorneys for Defendant Google LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on April 27, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: April 27, 2021

/s/ J. Mark Mann

**J. Mark Mann**